

UNITED STATES DISTRICT COURT
for the
District of Nebraska

SEALED

In the Matter of the Seizure of

(Briefly describe the property to be seized)

drugstrack.com, silkroadmeds.com, silkroadmedsonline.com, bestdrugcorner.com, rxeasymeds.com, pandapharmacy.com, legitrxshop.com,
healthmartpharma.com, legitrxonline.com, rxpharmacyusa.com, wandbd.com, chemandpills.com, pharmacyinn.com, rxdrugsorder.com, my-
carepharmacy.com, drugs-orderonline.com, pillspoint.com, onlinexhub.com, pharmacy-xl.com, rxdrugpharmacy.com, drugs-point.com,
apexmedico.net, rxpharmaplus.net, rxmedonline.net, shopdrugsonline.net, medsovernight.net, thedrugsonline.net, legitdrugs.net,
legitpharmacy.net, rxovernight.net, and onedrugstore.net

Case No. 8:21MJ16

**APPLICATION FOR A WARRANT
TO SEIZE PROPERTY SUBJECT TO FORFEITURE**

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the _____ District of _____ Nebraska is subject to forfeiture to the United States of America under _____ 21 U.S.C. § 853 and 18 U.S.C. §§ 981 & 982 *(describe the property)*:

See Attachment A

The application is based on these facts:
See Attached Affidavit in Support of an Application for a Seizure Warrant.

☒ Continued on the attached sheet.



Applicant's signature

SA Joshua D. Black, DEA

Printed name and title

☐ Sworn to before me and signed in my presence.

☒ Sworn to before me by telephone or other reliable electronic means.

Date: 1/6/2021



Judge's signature

City and state: Omaha, Nebraska

Michael D. Nelson, United States Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA

)

Case No.:

)

v.

)

Filed Under Seal

)

drugstrack.com, silkroadmeds.com,
silkroadmedsonline.com, bestdrugcorner.com,
rxeasydrugs.com, pandapharmacy.com,
legitrxshop.com, healthmartpharma.com,
legitrxonline.com, rxpharmacyusa.com,
wandbd.com, chemandpills.com,
pharmacyinn.com, rxdrugsorder.com, my-
carepharmacy.com, drugs-orderonline.com,
pillspoint.com, onlinerxhub.com, pharmacy-
xl.com, rxdrugpharmacy.com, drugs-point.com,
apexmedico.net, rxpharmaplus.net,
rxmedzonline.net, shopdrugsonline.net,
medsovernight.net, thedrugsonline.net,
legitdrugs.net, legitpharmacy.net,
rxovernight.net, and onedrugstore.net

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AFFIDAVIT IN SUPPORT OF SEIZURE WARRANT

I, **Special Agent Joshua Black**, being duly sworn, hereby declare as follows:

INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed since October 2016. I am currently assigned to the Omaha Division Office, charged with investigating drug trafficking and money laundering violations under Titles 18 and 21 of the United States Code. I have received 20 weeks of specialized training in Quantico,

Virginia, pertaining to drug trafficking, money laundering, undercover operations and electronic and physical surveillance procedures. Before becoming a Special Agent with the DEA, your Affiant was employed by the City of Papillion Police Department, Papillion, Nebraska for approximately seven years. I have been involved in numerous investigations dealing with the possession, manufacture, distribution, and importation of controlled substances.

2. In my work as a Special Agent with the DEA, I have been involved in controlled purchases, surveillance, electronic surveillance, arrest of drug traffickers, interviewing of drug traffickers, trash pulls, and the execution of search warrants on residences, businesses, vehicles and electronic devices. As a result, I have arrested individuals for violating State and Federal statutes regarding the possession, manufacture, transportation and sale of controlled substances. I have conducted and have been associated with investigations involving the interception of wire communications and electronic communications obtained from cellular telephone devices and smart phones. I am familiar with the ways in which drug traffickers conduct business, including, but not limited to, their methods of importing and distributing controlled substances, their use of cellular telephones, their use of computers and smart phones and their use of numerical codes and code words to conduct their transactions.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. This affidavit is made in support of an application for seizure of the following domain names:

drugstrack.com, silkroadmeds.com, silkroadmedsonline.com, bestdrugcorner.com, rxeasymeds.com, pandapharmacy.com, legitrxshop.com, healthmartpharma.com,

legitrxonline.com, rxpharmacyusa.com, wandbd.com, chemandpills.com, pharmacyinn.com, rxdrugsonline.com, my-carepharmacy.com, drugs-orderonline.com, pillspoint.com, onlinerxhub.com, pharmacy-xl.com, rxdrugpharmacy.com, drugs-point.com, apexmedico.net, rxpharmaplus.net, rxmedzonline.net, shopdrugsonline.net, medsovernight.net, thedrugsonline.net, legitdrugs.net, legitpharmacy.net, rxovernight.net, and onedrugstore.net

hereinafter referred to as the Subject Domain Names.

5. As set forth below, there is probable cause to believe that the Subject Domain Names are property used, or intended to be used, to commit or facilitate violations of Title 21 U.S.C. § 841 (distribution of a controlled substance) and Title 21 U.S.C. § 846 (conspiracy to distribute a controlled substance), and subject to seizure and forfeiture pursuant to Title 21 U.S.C. § 853, and Title 18 U.S.C. §§ 981 & 982.

6. The procedure by which the government will seize the Subject Domain Names is described in Attachment A hereto and below.

BACKGROUND ON DOMAIN NAMES

7. Based on my training and experience and information learned from others, I am aware of the following:

8. Internet Protocol Address: An Internet Protocol address (IP address) is a unique numeric address used by computers on the Internet. An IP Address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address -- it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by ISPs.

9. Domain Name: A domain name is a simple, easy-to-remember way for humans

to identify computers on the Internet, using a series of characters (e.g., letters, numbers, or other characters) that correspond with a particular IP address. For example, “usdoj.gov” and “cnn.com” are domain names.

10. Domain Name System: The domain name system (“DNS”) is, among other things, a hierarchical convention for domain names. Domain names are composed of one or more parts, or “labels,” that are delimited by periods, such as “www.example.com.” The hierarchy of domains descends from right to left; each label to the left specifies a subdivision, or subdomain, of the domain on the right. The right-most label conveys the “top-level” domain. For example, the domain name “www.example.com” means that the computer assigned that name is in the “.com” top-level domain, the “example” second-level domain, and is the web server.

11. Domain Name Servers: DNS servers are computers connected to the Internet that convert, or resolve, domain names into Internet Protocol (“IP”) addresses.

12. Registry: For each top-level domain (such as “.com”), there is a single company, called a “registry,” that determines which second-level domain resolves to which IP address. For example, the registry for the “.com” and “.net” top-level domains are VeriSign, Inc., which has its headquarters at 12061 Bluemont Way, Reston, Virginia.

13. Registrar & Registrant: Domain names may be purchased through a registrar, which acts as the intermediary between the registry and the purchasers of the domain name. The individual or business that purchases, or registers, a domain name is called a “registrant.” Registrants control the IP address, and thus the computer, to which their domain name resolves. Thus, a registrant may easily move a domain name to another computer anywhere in the world. Typically, a registrar will provide a registrant with the ability to change the IP address a

particular IP address resolves through an online interface. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

14. Whois: A "Whois" search provides publicly available information as to which entity is responsible for a particular IP address or domain name. A Whois record for a particular IP address or domain name will list a range of IP addresses that that IP address falls within and the entity responsible for that IP address range and domain name. For example, a Whois record for the domain name XYZ.COM might list an IP address range of 12.345.67.0- 12.345.67.99 and list Company ABC as the responsible entity. In this example, Company ABC would be responsible for the domain name XYZ.COM and IP addresses 12.345.67.0- 12.345.67.99.

CASE BACKGROUND

15. Since April 2018, the Drug Enforcement Administration (DEA) Omaha Division Office, in coordination with the Food and Drug Administration (FDA) Houston office, have been investigating the drug trafficking and money laundering activities of Asif ALI, Farhan ALI, Fezan ALI, Avnish MISHRA, Mohammad Nazmul HAQUE, Rick KELLEY, Joseph MACKE, and their associates; hereinafter referred to as the Silkroad Meds Drug Trafficking Organization (DTO). Agents believe that Silkroad Meds DTO controls a narcotics distribution and money laundering network operating in Pakistan, India, Philippines, Italy, Spain, and the United States, and is responsible for the distribution of counterfeit pharmaceutical drugs worldwide utilizing various domains to engage with "customers," various shipping companies for deliveries, and various financial institutions for the collection of payments related to narcotics sales. The DTO utilizes a number of domains on the internet to advertise controlled pharmaceutical drugs for sale. Each of the domains provide the same or similar products for sale.

16. In April 2018, DEA received a tip from Mallinckrodt Pharmaceuticals, a US company, that the company's morphine-sulphate pills were being advertised for sale on the domain, silkroadmeds.com. The representative for Mallinckrodt Pharmaceuticals denied the company has a relationship with silkroadmeds.com, and the representative claimed that any product purported by silkroadmeds.com to be produced by Mallinckrodt Pharmaceuticals is more than likely a counterfeit product. Investigators inspected the domain and observed numerous brand name pharmaceutical drugs for sale on the site. The site doesn't require customers to have a prescription to order controlled substances and it uses Western Union and MoneyGram for customers to remit payments.

17. Between April 2018 and September 2020, agents performed five controlled purchases of oxycodone, morphine-sulfate, Adderall, atorvastatin, risperidone, and Cialis pills.

- a. April 24, 2018 – A controlled purchase was made through the silkroadmeds.com domain for 60 morphine-sulfate 30mg pills and 30 oxycodone 40mg pills for \$456.00, in which a prescription was not required. On April 27, 2018, the payment was submitted via Money Gram to Lahore, Pakistan. On June 4, 2018, a small brown paper envelope was received in an undercover Omaha, Nebraska United States Postal Service (USPS) post office box from Manila, Philippines. The envelope contained 50 small round blue pills with “M” imprinted on one side and “30” imprinted on the other side. The pills were sent to the DEA North Central Laboratory, and concluded the 50 pills were counterfeit and did not contain oxycodone. The chemical analysis revealed the pills were made of heroin, caffeine, acetaminophen, methorphan, and 06-monoacetylmorphine.

- b. June 29, 2018 – A controlled purchase was made through the silkroadmeds.com

domain for 315 oxycodone 30mg pills for \$1,950.75, in which a prescription was not required. The payment was submitted via Money Gram to Lahore, Pakistan. On July 12, 2018, a small brown paper envelope was received in an undercover Omaha, Nebraska USPS post office box from Manila, Philippines. The envelope contained 315 small round blue pills with “M” imprinted on one side and “30” imprinted on the other side. The pills were sent to the DEA North Central Laboratory, and concluded the 315 pills did not contain oxycodone. The chemical analysis revealed the pills were made of heroin, caffeine, and 06-monoacetylmorphine.

- c. July 12, 2018 – A controlled purchase was made through the silkroadmeds.com domain for 90 Adderall 30mg tablets, 200 Lipitor (Atorvastatin) 20mg tablets, 90 Risperdal (risperidone) 4mg tablets, 30 oxycodone 80mg tablets, and 30 oxycodone 40mg tablets for \$1,438.00, in which a prescription was not required. On July 23, 2018, the payment was submitted via Western Union to Pakistan. On August 22, 2018, a white colored envelope was received in an undercover Tomball, Texas USPS post office box from Quezon City, Philippines. The envelope only contained 100 pink colored tablets with “30” on one side and the letters “AD” on the other side. The pills were sent to the Food and Drug Administration (FDA) for analysis. The chemical analysis revealed the pills were counterfeit and made of ketamine and methorphan, and did not contain amphetamine mixture (Adderall).
- d. October 18, 2018 – A controlled purchase was made through the silkroadmedsonline.com domain for 90 Adderall 30mg tablets, 30 oxycodone

40mg tablets, 60 morphine-sulphate 60mg tablets, and 60 tablets of Cialis for \$1,053.00, in which a prescription was not required. On October 31, 2018, the payment was submitted via Western Union to Pakistan. On August 22, 2018, a small brown colored envelope was received in an undercover Cypress, Texas United Parcel Service (UPS) post office box from Greenheights Village, Manila, Philippines. The envelope only contained 40 suspected oxycodone 30mg pills and 100 suspected Adderall 30mg tablets. The pills were sent to the Food and Drug Administration (FDA) for analysis. The chemical analysis revealed the pills were counterfeit and made of ketamine, methorphan, and caffeine.

- e. September 10, 2020 – A controlled purchase was made through the silkroadmeds.com domain for 60 OxyContin (oxycodone) 80mg pills for \$795.00, in which a prescription was not required. On September 17, 2020, the payment was submitted via Money Gram to Lahore, Pakistan. On September 22, 2020, investigators sent an email to silkroadmeds.com asking for a tracking number for the shipment. On September 29, 2020, silkroadmeds.com responded back, “we have Oxi Out of stock at this time & we have send you 60 pills of morphine & 60 pills of Percocet both are for pain killer. You should must be getyour parcel don’t you worry about that we are not scammer.”

18. During the initial undercover buy in April 2018, an email was sent from busniesspluss@gmail.com to the undercover email address used for the transaction, in which a tracking number was provided. The tracking number was tracked from Manila, Philippines to Omaha, Nebraska. On June 4, 2018, agents received the package and the contents were later found to be counterfeit oxycodone pills. In July 2018, SA Frank Feden executed a federal search

warrant on Google account busniesspluss@gmail.com.

19. After reviewing the data received from Google, agents discovered the email account had a recovery email and Pakistani phone number: rickpaul38@gmail.com and 92-347-041-3699. A recovery email address is a separate email address that clients can list on their email accounts that if a client becomes locked out of their email account, they can request a password reset in which the new password can be sent to them at the recovery email. On August 23, 2018, a federal search warrant was executed on Google account rickpaul38@gmail.com.

20. An analysis of the email content of rickpaul38@gmail.com revealed this account was receiving email copies of customer drug orders from the following domains: medscareonline.com, overallpharmacy.us, usrxmedsonline.com, overthcounter.com, overthcounter.org, overallpharmacy.com, usdrugsaver.com, us2us-rx.com, drugs-order.net, zampharma.com, drugsplace.com, oneplushealthcare.net, rxdrugpharmacy.com, onlinerxhub.com, pillspharma.com, legitrxshop.com, rxstuff.net, mpzmail.com, pharmadaddy.biz, rxpharmacyline.com, apexmedico.net, rxpharmaplus.net, uspharmacyhub.com, drugs-point.com, silkroadmeds.com, and silkroadmedsonline.com. Currently, only the following domains are active and currently advertising controlled pharmaceutical drugs for sale: overallpharmacy.com, rxdrugpharmacy.com, onlinerxhub.com, legitrxshop.com, apexmedico.net, rxpharmaplus.net, drugs-point.com, silkroadmeds.com, and silkroadmedsonline.com.

21. The rickpaul38@gmail.com account had numerous excel spreadsheets, HTML docs and a zipped drive containing back up information for Pharmadaddy.bz on its Google Drive. The spreadsheets detailed customer information and orders as well as payment information. The spreadsheets also contained shipping information and business expenses. The

HTML docs contained comments associated with different spreadsheets.

22. Based on the information received from the rickpaul38@gmail.com account, the Google account had listed other Gmail accounts on its Access Control List allowing those accounts access to its spreadsheets or had requested access to the spreadsheets. On March 27, 2019, SA Feden executed a federal search warrant to Google for the following Google accounts: healthmartpharma@gmail.com, pharmacypoint6@gmail.com, rx.shiping@gmail.com, website7038@gmail.com, davidrx2016@gmail.com, jamesbrown6070@gmail.com, fairnuman@gmail.com, bulk2usa@gmail.com, thedrugsonline365@gmail.com, rxpharmaplus2@gmail.com, deluxepharmacy1@gmail.com, faizanali629@gmail.com, snankls@gmail.com, bestdrugcorner@gmail.com, dynamicsteriods@gmail.com, lamilois6@gmail.com, buyrzonline@gmail.com, avnishmishra18@gmail.com, meds.wholesupply@gmail.com, and basharatrasheed4@gmail.com.

23. Based on a federal search warrant executed on February 22, 2019 to Oath Inc for haque88@aol.com, an analysis of that email account revealed the recovery email account was taylorleo576@gmail.com. A federal search warrant was then executed on March 28, 2019 to Google on account taylorleo576@gmail.com.

24. Based on a review of the data received from the federal search warrant that was executed on March 27, 2019, SA Feden executed another federal search warrant to Google on October 10, 2019 on Google accounts mtayyab04@gmail.com, don786.fa56@gmail.com, starkeyintl1@gmail.com, and vasilica.cristea76@gmail.com.

25. Based on a review of the data received from the federal search warrant that was executed on March 27, 2019, SA Feden executed another federal search warrant to Google on

April 1, 2020 on Google accounts Jackethen77@gmail.com, Alexandercolin007@gmail.com, Shaigee2266@gmail.com, and Sajidmehmood.official@gmail.com.

26. Based on a review of the data received from the federal search warrant that was executed on March 27, 2019, SA Feden executed federal search warrant to Oath Inc. on April 3, 2020 on account goharalirajput@yahoo.com.

27. After executing all of the federal search warrants on the numerous email accounts, investigators then analyzed the data received from those warrants. Investigators identified over one-hundred (100) domains, in which some had been operating as far back as 2012, that were being utilized to facilitate the sale and distribution of controlled pharmaceutical drugs worldwide. After analyzing the data from all of the email search warrants, investigators located countless emails, spreadsheets, word documents, and numerous other types of files attached to the emails, in which the Subject Domain Names were being utilized to facilitate the sale and distribution of controlled pharmaceutical drugs worldwide. Investigators determined that the thirty-one (31) Subject Domain Names are active and currently facilitating the sale and distribution of controlled pharmaceutical drugs worldwide.

THE SUBJECT DOMAIN NAME

28. As described above, each of the Subject Domains is currently being used, or has historically been utilized, to advertise the sale of, communicate with individuals for the sale of, and distribution of Schedule 1-5 controlled substances, with none of the Subject Domains requiring a prescription as required by United States law.

29. A search of publicly available WHOIS domain name registration records revealed that the Subject Domains were registered on specific dates and times to the registrar in the table

below. This table includes the registrant, if available, and the registry for each domain. The registrars Guangdong Nicenic Technology Co. Ltd, Deep Dive Domains LLC, and Dreamscape Networks International Pte Ltd are entities that allow domain owners to keep their contact details private during the domain name registration process.

<u>Domain</u>	<u>Date Registered</u>	<u>Registrar</u>	<u>Registrar Headquarters</u>	<u>Registrant</u>	<u>Registry</u>
apexmedico.net	4/20/2018	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
bestdrugcorner.com	4/3/2018	Dreamscape Networks International PTE LTD	Sydney South, NSW, Australia	Private Registry Authority	Verisign Inc
chemandpills.com	10/13/2018	Namesilo, LLC	Phoenix, Arizona	See PrivacyGuardian.org	Verisign Inc
drugs-orderonline.com	3/25/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
drugs-point.com	5/25/2016	Guangdong Nicenic Technology Co., Ltd.	Hong Kong, China	Kept Private	Verisign Inc
drugstrack.com	6/7/2017	Moniker Online Services LLC	Fort Lauderdale, Florida	Moniker Privacy Services	Verisign Inc
healthmartpharma.com	2/3/2015	Mesh Digital Limited	Hayes, Middlesex, England	Identity Protect Limited	Verisign Inc
legitdrugs.net	2/13/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
legitpharmacy.net	3/17/2019	PDR LTD. D/B/A Publicdomainregistry.com	Simpsonville, South Carolina	Pills Factory	Verisign Inc
legitrxonline.com	3/28/2018	Deep Dive Domains, LLC	Jacksonville, Florida	Kept Private	Verisign Inc
legitrxshop.com	6/19/2017	OnlineNIC Inc	Oakland, California	Rxhosts	Verisign Inc
medsovernight.net	2/12/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
my-carepharmacy.com	3/18/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
onedrugstore.net	2/6/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Pills Factory	Verisign Inc
onlinerxhub.com	12/21/2015	Moniker Online Services LLC	Fort Lauderdale, Florida	Moniker Privacy Services	Verisign Inc
pandapharmacy.com	10/22/2014	Mesh Digital Limited	Hayes, Middlesex, England	Identity Protect Limited	Verisign Inc
pharmacyinn.com	1/19/2019	Namesilo, LLC	Phoenix, Arizona	See PrivacyGuardian.org	Verisign Inc
pharmacy-xl.com	8/10/2016	Mesh Digital Limited	Hayes, Middlesex, England	Identity Protect Limited	Verisign Inc
pillspoint.com	9/25/2015	Dreamscape Networks International PTE LTD	Sydney South, NSW, Australia	Private Registry Authority	Verisign Inc
rxdrugpharmacy.com	10/18/2016	Moniker Online Services LLC	Fort Lauderdale, Florida	Moniker Privacy Services	Verisign Inc
rxdrugorder.com	3/13/2019	Namesilo, LLC	Phoenix, Arizona	See PrivacyGuardian.org	Verisign Inc
rxeasy meds.com	11/8/2014	Guangdong Nicenic Technology Co., Ltd.	Honk Kong, China	Kept Private	Verisign Inc
rxmedzonline.net	8/27/2019	Dreamscape Networks International PTE LTD	Sydney South, NSW, Australia	Private Registry Authority	Verisign Inc
rxovernight.net	2/11/2019	Dynadot LLC	San Mateo, California	No Information	Verisign Inc
rxpharmacyusa.com	2/17/2018	Dropcatch.com 1330 LLC	Denver, Colorado	No Information	Verisign Inc
rxpharmaplus.net	8/15/2018	Dreamscape Networks International PTE LTD	Kept Private	Kept Private	Verisign Inc
shopdrugsonline.net	7/31/2019	Dreamscape Networks International PTE LTD	Singapore, Singapore	Kept Private	Verisign Inc

<u>Domain</u>	<u>Date Registered</u>	<u>Registrar</u>	<u>Registrar Headquarters</u>	<u>Registrant</u>	<u>Registry</u>
silkroadmeds.com	2/25/2016	Guangdong Nicenic Technology Co.	Multan, Punjab, Pakistan	Kept Private	Verisign Inc
silkroadmedsonline.com	5/24/2018	Guangdong Nicenic Technology Co.	Multan, Punjab, Pakistan	Kept Private	Verisign Inc
thedrugsonline.net	3/7/2019	PDR LTD. D/B/A Publicdomainregistry.com	Burlington, Massachusetts	Privacy Protect, LLC	Verisign Inc
wandbd.com	6/28/2019	Namesilo, LLC	Phoenix, Arizona	See PrivacyGuardian.org	Verisign Inc

30. The top-level domain for the Subject Domain Names ending in “.com” and “.net” is Verisign, Inc., which has its headquarters at 12061 Bluemont Way, Reston, Virginia.

CRIMINAL AND CIVIL STATUTORY BASIS FOR SEIZURE AND FORFEITURE

31. Title 21, U.S.C. § 853(a) states that any person found in violation of Title 21 U.S.C. § 841(a), shall forfeit to the United States any property derived from any *proceeds* the person obtained, directly or indirectly, and any property used, or intended to be used, to commit or *facilitate* the commission of the violation of Title 21 U.S.C. § 841(a). (emphasis added; see also Title 28 U.S.C. § 2461(c)). Title 21, U.S.C. § 846 provides that any person who attempts or conspires to commit a violation of [21 U.S.C. 841] shall be subject to the same penalties as those prescribed for the offense

32. In addition, Title 18 U.S.C. § 981(a)(1)(B)(i), allows for the civil forfeiture of any property, real or personal, constituting, derived from, or traceable to, any proceeds obtained directly or indirectly from the manufacture, importation, sale or distribution of a controlled substance or any property used to facilitate such an offense.

33. Pursuant to Title 18 U.S.C. § 981(b), property subject to forfeiture pursuant to Title 18 U.S.C. §§ 981(a)(1)(A) or 981(a)(1)(C), may be seized by the United States pursuant to a warrant obtained in the same manner as provided or a search warrant under the Federal Rules of Criminal Procedure.

34. With regard to the crime of money laundering, Title 18 U.S.C. § 982(a)(1)

instructs that a court, in imposing sentence on a person convicted of an offense in violation of Title 18 U.S.C. §§ 1956 or 1957, shall order the person to forfeit to the United States, any real or personal property *involved in* such offense, or any property traceable to such property. (emphasis added).

35. Moreover, Title 18 U.S.C. § 981(a)(1)(C) provides that any property, real or personal, which constitutes or is derived from *proceeds traceable to* a violation of Title 21 U.S.C. § 841, as “specified unlawful activity” (as defined in Title 18 U.S.C. § 1956(c)(7)) or conspiracy to commit a violation of Title 21 U.S.C. § 841, is subject to forfeiture to the United States. (emphasis added)

36. Furthermore, Title 18 U.S.C. § 981(a)(1)(A) provides for forfeiture of any property, real or personal, *involved in* a transaction or attempted transaction in violation of Title 18 U.S.C. §§ 1956 or 1957, or any property traceable to such property. (emphasis added)

37. Title 18 U.S.C. § 982(b)(1) authorizes the issuance of a criminal seizure warrant under Title 21, U.S.C. § 853(f) which provides in relevant part that a seizure warrant for property subject to forfeiture may be sought in the same manner in which a search warrant may be issued. A court shall issue a criminal seizure warrant if it determines that the property to be seized would, in the event of a conviction, be subject to forfeiture and that a restraining order would be inadequate to assure the availability of the property for forfeiture.

38. Neither a restraining order nor an injunction is sufficient to guarantee the availability of the Subject Domain Names for forfeiture. By seizing the Subject Domain Names and redirecting it to another domain, the Government will prevent third parties from acquiring the name and using it to commit additional crimes. Furthermore, seizure of the Subject Domain Names will prevent third parties from continuing to access the Subject Domain Names’ domain

in their present form.

39. Title 18 U.S.C. § 981(h) provides that venue for civil forfeitures brought under this section lies in the district either where the defendant owning the property is located or in the judicial district where the criminal prosecution is brought.

40. Title 21 U.S.C. § 853(l) provides that district courts of the United States shall have jurisdiction to enter orders as provided in this section without regard to the location of any property which may be subject to forfeiture or ordered forfeited under this section.

41. As set forth above, there is probable cause to believe that the Subject Domain Names are subject to civil and criminal forfeiture because it was used in the commission of violations of Title 21 U.S.C. § 841 (distribution of a controlled substance) and Title 21 U.S.C. § 846 (conspiracy to distribute a controlled substance). Specifically, the Subject Domain Names were involved in – and enabled –the facilitation of the sale and distribution of controlled pharmaceutical drugs worldwide, which were conducted in violation of the U.S.C.

SEIZURE PROCEDURE

42. As detailed in Attachment A, upon execution of the seizure warrant, the registrar for the Subject Domain Names, ending in “.com” and “.net” are Verisign, Inc., which has its headquarters at 12061 Bluemont Way, Reston, Virginia, shall be directed to restrain and lock the Subject Domain Names pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAME to the United States upon completion of forfeiture proceedings, to ensure that changes to the Subject Domain Names cannot be made absent court order or, if forfeited to the United States, without prior consultation with DEA or DOJ.

43. In addition, upon seizure of the Subject Domain Names by DEA, will be directed to associate the Subject Domain Names to a new authoritative name server(s) to be designated by

a law enforcement agent. The Government will display a notice on the domain to which the Subject Domain Names will resolve indicating that the sites have been seized pursuant to a warrant issued by this court.

REQUEST FOR SEALING

44. It is respectfully requested that this Court issue an order sealing all papers submitted in support of this application, including the application, affidavit, and search warrant. The investigation of the criminal activity discussed above is ongoing and may involve multiple targets, many of whom may not have yet been identified. Moreover, the DEA is not aware of any potential targets that have knowledge of its investigation. Disclosure of the search warrant, this affidavit, or this application may result in the dissemination of these materials to the targets, who may destroy evidence or otherwise evade the investigation. Disclosure of the contents of this affidavit and related documents might have a significant and negative impact on the continuing investigation and might severely jeopardize its effectiveness.

45. Although the above documents may be sealed, it is respectfully requested that the data obtained as a result of the search warrant may be disclosed to third parties to facilitate analysis. I further request that the Court issue an order commanding VeriSign, Inc, not notify any person of the existence of the search warrant under Title 18 U.S.C. § 2705(b). Finally, and in order to protect the ongoing investigation and in consideration that much of the information set forth above is not otherwise publicly available, I respectfully request that this Affidavit be filed and kept under seal until further order of this Court.

CONCLUSION

46. For the foregoing reasons, I submit that there is probable cause to believe that the Subject Domain Names are used in and/or intended to be used in facilitating and/or committing the Subject Offenses. Accordingly, the Subject Domain Names are subject to forfeiture to the United States pursuant to Title 21 U.S.C. § 853, Title 18 U.S.C. §§ 981 and 982, and Title 21 U.S.C. § 841 (distribution of a controlled substance), Title 21 U.S.C. § 846 (conspiracy to distribute a controlled substance), and I respectfully request that the Court issue a seizure warrant for the Subject Domain Names.

47. Because the warrant will be served on VeriSign, Inc., which controls the Subject Domain Names, and VeriSign, Inc., thereafter, at a time convenient to it, will transfer control of the Subject Domain Names to the government, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,



Joshua Black, Special Agent
Drug Enforcement Administration

Sworn to before me by reliable electronic means:

Date: 01/06/2021

City and State: Omaha, Nebraska



Michael D. Nelson, U.S. Magistrate Judge

ATTACHMENT A

I. Seizure Procedure

A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the corresponding domain name registry listed in section II ("Subject Registry") and the domain name registrars based in the United States listed in Section III ("Subject Registrars") who will be directed, for the domain names listed in section IV ("Subject Domain Names") for which it serves as the top-level domain registry, to make any changes necessary to restrain and lock the domain name pending transfer of all rights, title, and interest in the Subject Domain Name to the United States upon completion of forfeiture proceedings.

B. Upon seizure of the Subject Domains, the Subject Registry shall point the subject to Domain Name to IP address 162.159.24.49 (NS1.JUSTHOST.COM) and/or 162.159.25.241 (NS2.JUSTHOST.COM) at which the Government will display a web page with the following notice:

"This website has been seized by the United States Drug Enforcement Administration in accordance with a seizure warrant issued pursuant to 18 U.S.C. §§ 981, 982, and 21 U.S.C. § 853 by the United States District Court for the District of Nebraska as part of a joint law enforcement action by: the United States Drug Enforcement Administration and the United States Food and Drug Administration."

C. The Subject Registry is directed to take all steps necessary to lock the Subject Domain Names at the registry level to ensure that changes to the Subject Domain Names cannot be made absent court order or, if forfeited to the United States, without prior consultation with the DEA. The DNS record should be altered to remove any applicable name servers.

D. Upon seizure of the Subject Domain, any records, databases, tables, or documents that are used by the Subject Registrar to identify the owner of the subject Domain Name shall be modified to reflect the seizure of the Subject Domain Name. These changes related to the following records if they exist:

1. The "Registrant", "Technical Contact", "Administrative Contact", "Billing Contact", and "Zone Contact" will reflect the following information"
 - a. Name: "Drug Enforcement Administration"
 - b. Address: 10555 Furnace Road, Lorton, VA 22079
 - c. Country: USA

- d. Telephone: 1-571-362-7251
- e. Email: Phillip.J.Dimmer@usdoj.gov
- f. Fax: 571-362-5785

2. All name server fields will be changed to reflect
"NS1.REDIRECT.DEA.GOV" and/or
"NS2 .REDIRECT.DEA.GOV"

3. Any remaining fields will be changed so they do not reflect any
individual or entity.

E. Take all reasonable measures to propagate the necessary changes through
the Domain Name System as quickly as practicable.

F. Provide reasonable assistance in implementing the Terms of this Order
and take no unreasonable action to frustrate the implementation of this Order.

II. Subject Registry

Verisign, Inc
12061 Bluemont Way Reston, Virginia 20190

III. Subject Registrars

Dreamscape Networks International PTE LTD
Suite 4.07,
247 Coward Street
Mascot, NSW 2020
Telephone: +91-8-9422-0894

PublicDomainRegistry .com
501, IT Building No. 3,
NESCO IT Park, NESCO Complex,
Western Express Highway, Goregaon (East) Mumbai- 400063
Maharashtra, India
Telephone +91-22-67209000

Guangdong Nicenic Technology Co., Ltd.
7A-1, 7th Floor, No. 6 Jingyuan Road, Jida
Industrial Zone, Zhuhai, Guangdong, 519000
Telephone: 0756-3366365
Fax: 0756-3366385-806

Moniker Online Services, LLC

1994 East Sunrise Boulevard #223
Fort Lauderdale, FL 33304
Telephone: 844-760-0251
Fax: 1-954-337-0662

Mesh Digital Limited
The Old Forge, Shackstead Lane
Surrey Godalming, GU7-1RJ
Telephone: +44-1483-304-030

Deep Dive Domains, LLC
5335 Gate Parkway
Jacksonville, Florida 32256
Telephone: 1-888-642-9675

OnlineNIC, Inc.
3027 Teagarden Street
San Leandro, California 94577
Telephone: 1-510-769-8492
Fax: 1-510-769-8487

Dynadot, LLC
210 S Ellsworth Ave #345
San Mateo, California 94401
Telephone: 1-866-262-3399
Fax: 1-415-869-2893

DropCatch.com 1300 LLC
2635 Walnut Street
Denver, Colorado 80205
Telephone: 1-303-502-9098
Fax: 1-303-893-0507

NameSilo LLC
1300 E Missouri Avenue
Suite A-110
Phoenix, Arizona 85014
Telephone: 602-492-8198

IV. **Subject Domain Names**

apexmedico.net
bestdrugcorner.com
chemandpills.com
drugs-orderonline.com

drugs-point.com
drugstrack.com
healthmartpharma.com
legitdrugs.net
legitpharmacy.net
legitrxonline.com
legitrxshop.com
medsovernight.net
my-carepharmacy.com
onedrugstore.net
onlinerxhub.com
pandapharmacy.com
pharmacyinn.com
pharmacy-xl.com
pillspoint.com
rxdrugpharmacy.com
rxdrugsorder.com
rx easymeds.com
rxmedzonline.net
rxovernight.net
rxpharmacyusa.com
rxpharmaplus.net
shopdrugsonline.net
silkroadmeds.com
silkroadmedsonline.com
thedrugsonline.net
wandbd.com

AO 109 (Rev. 12/09) Warrant to Seize Property Subject to Forfeiture

UNITED STATES DISTRICT COURT

for the
District of Nebraska**SEALED**

In the Matter of the Seizure of)

(Briefly describe the property to be seized))

drugtrack.com, silkroadmeds.com, silkroadmedsonline.com, bestdrugcorner.com, rxeasy.com, pandapharmacy.com, legitrxshop.com,
healthmartpharma.com, legitrxonline.com, rxpharmacyusa.com, wandbd.com, chemandpills.com, pharmacyinn.com, rxdrugorder.com, my-
carepharmacy.com, drugs-orderonline.com, pillspoint.com, onlinexhub.com, pharmacy-xl.com, rxdrugpharmacy.com, drugs-point.com,
apexmedico.net, rxpharmaplus.net, rxmedzonline.net, shopdrugsonline.net, medsovernight.net, thedrugsonline.net, legitdrugs.net,
legitpharmacy.net, rxovernight.net, and onedrugstore.net

Case No. 8:21MJ16

WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests that certain property located in the _____ District of _____ Nebraska be seized as being subject to forfeiture to the United States of America. The property is described as follows:

See Attachment A

I find that the affidavit(s) and any recorded testimony establish probable cause to seize the property.

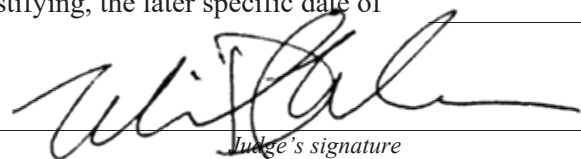
YOU ARE COMMANDED to execute this warrant and seize the property on or before 01/20/2021
(not to exceed 14 days)

☐ in the daytime – 6:00 a.m. to 10:00 p.m.☒ at any time in the day or night, as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must also give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

An officer present during the execution of the warrant must prepare, as required by law, an inventory of any property seized and the officer executing the warrant must promptly return this warrant and a copy of the inventory to United States Magistrate Judge Michael D. Nelson
(name)

☒ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) ☒ for 30 days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____.Date and time issued: 1/6/2021 3:53 pm


Judge's signature

City and state: Omaha, Nebraska

Michael D. Nelson, United States Magistrate Judge
Printed name and title

[illegible]

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 - b. Address: 10555 Furnace Road, Lorton, VA 22079
 - c. Country: USA

- d. Telephone: 1-571-362-7251
- e. Email: Phillip.J.Dimmer@usdoj.gov
- f. Fax: 571-362-5785

2. All name server fields will be changed to reflect
"NS1.REDIRECT.DEA.GOV" and/or
"NS2 .REDIRECT.DEA.GOV"

3. Any remaining fields will be changed so they do not reflect any
individual or entity.

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and take no unreasonable action to frustrate the implementation of this Order.

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12061 Bluemont Way Reston, Virginia 20190

III. Subject Registrars

Dreamscape Networks International PTE LTD
Suite 4.07,
247 Coward Street
Mascot, NSW 2020
Telephone: +91-8-9422-0894

PublicDomainRegistry .com
501, IT Building No. 3,
NESCO IT Park, NESCO Complex,
Western Express Highway, Goregaon (East) Mumbai- 400063
Maharashtra, India
Telephone +91-22-67209000

Guangdong Nicenic Technology Co., Ltd.
7A-1, 7th Floor, No. 6 Jingyuan Road, Jida
Industrial Zone, Zhuhai, Guangdong, 519000
Telephone: 0756-3366365
Fax: 0756-3366385-806

Moniker Online Services, LLC

1994 East Sunrise Boulevard #223
Fort Lauderdale, FL 33304
Telephone: 844-760-0251
Fax: 1-954-337-0662

Mesh Digital Limited
The Old Forge, Shackstead Lane
Surrey Godalming, GU7-1RJ
Telephone: +44-1483-304-030

Deep Dive Domains, LLC
5335 Gate Parkway
Jacksonville, Florida 32256
Telephone: 1-888-642-9675

OnlineNIC, Inc.
3027 Teagarden Street
San Leandro, California 94577
Telephone: 1-510-769-8492
Fax: 1-510-769-8487

Dynadot, LLC
210 S Ellsworth Ave #345
San Mateo, California 94401
Telephone: 1-866-262-3399
Fax: 1-415-869-2893

DropCatch.com 1300 LLC
2635 Walnut Street
Denver, Colorado 80205
Telephone: 1-303-502-9098
Fax: 1-303-893-0507

NameSilo LLC
1300 E Missouri Avenue
Suite A-110
Phoenix, Arizona 85014
Telephone: 602-492-8198

IV. **Subject Domain Names**

apexmedico.net
bestdrugcorner.com
chemandpills.com
drugs-orderonline.com

drugs-point.com
drugstrack.com
healthmartpharma.com
legitdrugs.net
legitpharmacy.net
legitrsonline.com
legitrshop.com
medsovernight.net
my-carepharmacy.com
onedrugstore.net
onlinershub.com
pandapharmacy.com
pharmacyinn.com
pharmacy-xl.com
pillspoint.com
rxdrugpharmacy.com
rxdrugsorder.com
rxeasydrugs.com
rxmedsonline.net
rxovernight.net
rxpharmacyusa.com
rxpharmaplus.net
shopdrugsonline.net
silkroadmeds.com
silkroadmedsonline.com
thedrugsonline.net
wandbd.com